



WISCONSIN

DEPARTMENT OF WORKFORCE DEVELOPMENT

Division of Economic Support
Bureau of Welfare Initiatives

**TO: Economic Support Supervisors
Economic Support Lead Workers
Training Staff
FSET Administrative and Provider Agencies
Child Care Coordinators
W-2 Agencies**

**FROM: Stephen M. Dow
Program Implementation Team
Policy Analysis and Program Implementation Section**

SUBJECT: PRORATED COMMUNITY SERVICE JOB (CSJ) POLICY

CROSS REFERENCE: W-2 Manual, Chapters 5, 7, 10 and 11
BWI Operations Memo 98-26

EFFECTIVE DATE: Changes will be moved to CARES production during the evening of October 15, 1999 and will be operational in CARES beginning 10/16/99.

PURPOSE

This memo explains the new prorated Community Service Job (CSJ) policy, including the appropriate use of a prorated CSJ placement and applicable CARES processing.

BACKGROUND

1997 Wisconsin Act 27 amended § 49.148(1)(b), Wis. Stats., to provide W-2 agencies with the option of paying a prorated CSJ payment amount if a participant is assigned to less than 30 hours per week of work training activities because of working in an unsubsidized job. This legislative change supports the fact that employment (even marginal employment) improves an individual's work habits and skills and creates a job history and that any attachment to the workforce must be maintained.

The following policies provide W-2 agencies with a tool in which to serve applicants or participants who have barriers which prevent them from increasing the number of hours in their current job **or** from obtaining another unsubsidized job while taking into account their other earned income. W-2 agencies have the **option** of providing prorated CSJ payments and are encouraged to detail their own internal policies using the following basic policy requirements.

NEW POLICY FOR PRORATED CSJ PAYMENTS

Eligibility

All W-2 applicants and participants must meet W-2 nonfinancial and financial eligibility requirements. A participant who is ultimately placed in a CSJ with a prorated payment will have to meet the same nonfinancial and financial eligibility requirements as any other participant. However, the primary purpose of W-2 is to prepare eligible parents, who are not job ready, for unsubsidized employment. Consequently,

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PRIORITY: High

not everyone is eligible for a W-2 cash payment. This may be true even when the individual meets other nonfinancial and financial eligibility criteria.

Assessment

Applicants who are working in an unsubsidized job less than full-time must be assessed and found to have barriers to either increasing the number of hours in their current job or from obtaining another unsubsidized job before being placed in a CSJ with a prorated payment.

During the initial assessment process, up-front job search activities may be assigned in order to determine if an applicant who is working in an unsubsidized job less than full-time has barriers which prevent an increase in the number of hours in the unsubsidized job. It is strongly encouraged that applicants for a W-2 employment position who are currently working be assigned up-front job search unless certain conditions exist that would prevent a productive search, e.g. doctor imposed limitations on work hours. Up-front job search may take place while the applicant is waiting to meet with the FEP, while submitting required verification, or while the FEP is determining if placement on the W-2 ladder is appropriate. The W-2 agency must assist both applicants and participants in their employment search.

The FEP has seven working days from the initial meeting with the applicant to determine whether to place the applicant in an employment position and, if so, in which employment position. The application processing can be extended up to 30 days only if the applicant needs extra time to meet verification requirements. Therefore, if an extended job search is necessary in order to verify whether or not the applicant is job ready, the application processing can be extended up to 30 days. However, during that time, the applicant will not receive a W-2 payment.

Applicants required to do an up-front job search may be eligible for child care, a Job Access Loan, Medicaid/BadgerCare, and food stamps in order to help sustain them during the time period in which the job search is taking place.

Placement on the W-2 Ladder

Unsubsidized Employment Rung

If the applicant meets the eligibility criteria, but has a strong work history and skills, the applicant may be most appropriate for placement on the Unsubsidized Employment rung of the W-2 ladder and offered intensive case management services.

Unsubsidized employment is the highest and most desirable rung on the employment ladder. The FEP must consider unsubsidized employment placement for all W-2 applicants, particularly those applicants who are already working in an unsubsidized job less than full time.

The following are examples of participant characteristics which W-2 agencies might consider in assessing a participant's ability to obtain an additional unsubsidized job or to increase the hours in their current unsubsidized job. A participant who:

1. Has limitations preventing increased unsubsidized employment opportunities which can be addressed through supportive services
2. Is capable of working and has a willing attitude
3. Has a steady and/or recent employment history
4. Has an education or training background that allows the individual to be competitive for available jobs in the unsubsidized labor market.

Applicants who are already employed and placed on the unsubsidized rung of the W-2 ladder (coded CMU) may receive case management services from the FEP for a 60-day period or longer if the participant still meets financial and nonfinancial eligibility criteria.

Community Service Job

The Community Service Job placement is primarily for individuals who are determined not ready for immediate regular employment. A CSJ placement may also be appropriate for individuals who are already working in an unsubsidized job less than 30 hours per week and where attempts to increase the number of hours in their current job or to find additional unsubsidized employment have not succeeded.

If the initial assessment reveals that the applicant has barriers that prevent them from obtaining an additional unsubsidized job or increasing the number of hours in their current job, placement in a CSJ may be appropriate.

Characteristics of an employed individual who may be appropriate for placement in a CSJ with a prorated payment include, but are not limited to, a participant who:

1. Has barriers to increased unsubsidized employment opportunities which cannot be addressed through supportive services;
2. Has a lack of skills needed that would allow the individual to be competitive for available jobs in the unsubsidized labor market;
3. Has a sporadic work history;
4. Shows little evidence of reliable work habits;
5. Does not have a high school diploma, GED or HSED;
6. Has a work history with frequent voluntary quits or terminations.

The agency must continue to assist the participant in ongoing job search for unsubsidized employment throughout the placement in a CSJ with a prorated payment.

Participation Requirements

CSJ participants are generally expected to participate 40 hours per week. This includes up to 30 hours per week in work training activities and up to 10 hours per week in education and training activities. CSJ participants eligible for a prorated CSJ payment are also expected to participate up to 40 hours per week in a **combination** of hours in their unsubsidized job, work training activities and education and training activities. The participant must be assigned CSJ activities that do not interfere with the hours they are expected to work at the unsubsidized job.

Additional case management services for CSJ participants who are working in an unsubsidized job less than full time include, but are not limited to:

1. Assistance in creating a financial plan
2. Providing information about job openings
3. Arranging job interviews with employers
4. Contacting employers on the individual's behalf
5. Assessing possible eligibility for a job access loan
6. Assessing eligibility for other work programs such as the Workforce Investment Act (WIA).

W-2 Payment

A participant placed in a CSJ receives a monthly payment of \$673. A participant placed in a CSJ who is working less than full-time in an unsubsidized job **may** receive a prorated CSJ payment. The FEP may select one of the following three pre-set levels of a prorated CSJ payment based on the number of hours the participant has been assigned to work training hours (reported as Work Experience (WE) on WPCH):

1/3 CSJ: \$230 for up to 10 hours of work training and up to 10 hours of education and training per week. (Participant working in unsubsidized employment 20 to 29 hours per week.)

1/2 CSJ: \$341 for 10 to 15 hours of work training and up to 10 hours of education and training per week. (Participant working in unsubsidized employment 15 to 19 hours per week.)

2/3 CSJ: \$452 for 15 to 20 hours of work training and up to 10 hours of education and training per week. (Participant working in unsubsidized employment 10 to 14 hours per week.)

Participants working up to nine hours per week in an unsubsidized job may be granted a full CSJ payment based on the marginally employed CSJ policy. Participants working greater than 30 hours per week in an unsubsidized job are not generally regarded as having barriers to full-time employment. Therefore, they would not usually be eligible for a prorated CSJ. Refer to the attached Prorated CSJ Hours Tracking Chart for assistance in determining the correct payment.

Initial and ongoing payments are issued according to current W-2 payment policies and procedures.

Payment Reduction Process

W-2 participants receiving a prorated payment must participate in all required work training activities and education and training activities. Payment for prorated CSJ payment recipients who fail to complete assigned work training activities and education and training activities will have their prorated payment amount reduced according to existing hourly payment reduction policies (\$5.15/hour).

A CSJ participant receiving a prorated payment, who fails, without good cause, to participate in a CSJ may accumulate strikes according to the existing employment position strike policy.

Ticking A Prorated CSJ Participant's Clock

A participant in a W-2 employment position has a lifetime participation limit of 60 months. Participation in any W-2 employment position is limited to 24 cumulative months in that position. A CSJ participant, whether a prorated or full CSJ payment type at any time during a month, will tick both clocks. There is no separate prorated CSJ clock.

FEPs should be sure to discuss this with the participant and determine whether or not a prorated CSJ would be in their best, long-term interest.

EXAMPLES

Hourly Reduction in Unsubsidized Job

John recently completed paid training in housekeeping at a local hotel. Once the training was complete, the employer reduced his hours to 28 hours per week. The FEP determines that John is not eligible for placement in a CSJ with a prorated payment because he has skills that would allow him to compete for available jobs in the unsubsidized labor market. Therefore, the FEP places John in Unsubsidized Employment coded CMU. The FEP discusses other resources John may utilize while he looks for additional unsubsidized employment, such as child care, a Job Access Loan, food stamps and medical assistance. The FEP arranges for him to participate in the agency's Job Club program and also familiarizes John with the employment services available through the Job Center network. The FEP must also assist John with his job search efforts by offering additional job search activities.

Brenda completed specialized paid training in repairing refrigeration parts at her current job. Once the training was complete, the employer reduced Brenda's hours to 23 hours per week. After a thorough assessment and an unsuccessful job search, the FEP determines that Brenda will not be able to increase her hours at work or obtain unsubsidized employment because the job market for refrigeration repair persons is extremely limited and Brenda lacks other skills that would allow her to compete for available jobs in the unsubsidized labor market. Brenda is assigned to an eight-week small engine repair course in the evenings for 10 hours per week and 7 hours of work training activities per week during the day at the county's physical plant. Her 1/3 CSJ payment, based on less than 10 hours of work activity per week, is \$230.

Seasonal Employment

Carla works in the Wisconsin Dells area for a local resort doing a variety of jobs. During the summer, Carla works 40 hours per week; however, as the season begins to end, Carla's hours are cut in half and eventually, for several months of the year, Carla has no employment. Currently, Carla is working only 18 hours per week. During her meeting with the FEP, the FEP discusses with Carla the options available to her. First, the FEP explains that there is a 60-month lifetime limit for W-2 benefits so if Carla continues in this cycle, at some point, W-2 may not be available to her. Second, the FEP points out that Carla has good skills in hospitality-type jobs, but explains to her that the area in which she lives may not provide the opportunities that will lead Carla and her family to self-sufficiency. Based on the fact that Carla has no potential income for the next couple of months, the FEP schedules Carla for 12 hours in a CSJ training activity and 10 hours per week in a financial planning and budgeting workshop. In addition, the FEP shows Carla how to use the JobNet to determine what types of jobs are available year round in the area she lives and how to locate jobs in other areas of the state that match her skills and would permit her to work throughout the year. Her 1/2 prorated CSJ payment, based on less than 15 hours of work activity per week, is \$341.

Marginally Employed

Sally currently works between 5 and 8 hours per week at Burger King. She does not have a high school diploma. Sally agrees with her FEP that by completing her GED, she will no longer have a barrier to obtaining full-time employment. Sally is placed in a CSJ position receiving a full CSJ payment. The FEP should assign Sally between 32 and 35 hours of CSJ activities including work experience activities and education activities that will assist Sally in obtaining her GED. These activities should be scheduled around her job at Burger King.

18 & 19-year Olds Currently in School

Amanda is an 18-year-old high school student who has a small child. Amanda works at a printing company 15 hours per week and attends school 15 hours per week through her high school's cooperative education program. Amanda and her FEP agree that by completing her high school education, she will no longer have a barrier to obtaining full-time employment. Amanda is placed in a CSJ and given a 1/2 prorated CSJ payment of \$341 per month. Because Amanda is under age 20, the FEP must permit her to attend high school to satisfy the required hours of participation in her CSJ. The FEP may assign additional activities as long as Amanda's combined hours in her unsubsidized job and her CSJ participation do not exceed 40 hours.

CARES PROCESSING

Three additional placement codes will be available on ACWI for prorated CSJ placements:

1. CS1: 1/3 CSJ (\$230) for up to 10 hours of work training
2. CS2: 1/2 CSJ (\$341) for 10 to 15 hours of work training
3. CS3: 2/3 CSJ (\$452) for 15 to 20 hours of work training

Workers should be sure to use the correct placement code when completing ACWI. All other CARES processing remains the same.

SUMMARY

W-2 agencies have the option of providing prorated CSJ payments to participants who have barriers which prevent them from increasing the number of hours in their current job or from obtaining another unsubsidized job. These basic policy requirements should be used as a guide for determining if a prorated CSJ placement is appropriate. Agencies may wish to detail their own internal policies for prorated CSJ placements as well.

PRORATED CSJ HOURS TRACKING CHART

		Hours in Unsubsidized Job	Maximum Work Activities	Maximum Education & Training	Total
<div>Full CSJ</div> <div>\$673.00</div>	1	29	10	40	
	2	28	10	40	
	3	27	10	40	
	4	26	10	40	
	5	25	10	40	
	6	24	10	40	
	7	23	10	40	
	8	22	10	40	
	9	21	10	40	
	10	20	10	40	
<div>2/3 CSJ</div> <div>\$452.00</div>	11	19	10	40	
	12	18	10	40	
	13	17	10	40	
	14	16	10	40	
	15	15	10	40	
<div>1/2 CSJ</div> <div>\$341.00</div>	16	14	10	40	
	17	13	10	40	
	18	12	10	40	
	19	11	10	40	
	20	10	10	40	
<div>1/3 CSJ</div> <div>\$230.00</div>	21	9	10	40	
	22	8	10	40	
	23	7	10	40	
	24	6	10	40	
	25	5	10	40	
	26	4	10	40	
	27	3	10	40	
	28	2	10	40	
	29	1	10	40	
<div>Generally Not Eligible</div>	30	0	0	30	
	31	0	0	31	
	32	0	0	32	
	33	0	0	33	
	34	0	0	34	
	35	0	0	35	
	36	0	0	36	
	37	0	0	37	
	38	0	0	38	
	39	0	0	39	
	40	0	0	40	